

From: Joseph Lenahan, *RII*
To: Brian Bonser, George Belisle, Kerry Landis, *RII*
Date: Wed, Nov 17, 1999 8:37 AM
Subject: Harris Spent Fuel Pool Expansion

Based on discussions with the NRR personnel (Heck & Naujock) who are involved in the licensing action to startup the "C" & "D" fuel pools and the information determined during the inspection as of 11/16/99, my understanding of the scope of Region II's responsibility for this inspection is as follows:

1. NRR has the lead for reviewing the weld issues. This includes review of the alternate inspection plan [10 CFR 50.55(a)] and resolution of questions on the original weld quality for which CP&L has no documentation. NRR requested that we assist them in reviewing results of NRC inspections performed during construction, reviewing QA/QC procedures which controlled welding activities, reviewing a sample of original weld records, and reviewing a portion the alternate weld inspection program. There is insufficient time for Crowley to become fully cognizant of all the weld issues this week and make an independent determination whether or not the welds are acceptable. This will be NRR's role. They have been involved in review of the weld issues for several months.
2. The NRR reviewers requested that Region II (Crowley) review the condition of the "C" & "D" fuel pool equipment (heat exchangers, pumps, motors, valves, etc.) which was installed in the early 1980's during construction. Inspection findings to date disclosed that CP&L did not have an equipment layup program for periodic inspection of mechanical components since construction, and had only a limited program for electrical components. We have not yet reviewed the program for the electrical components (waiting for info from CP&L). CP&L is in the process of developing an equipment commissioning program as part of the plant modification. An ESR will be developed to define this program. To date they have only a brief outline of what they plan to do, but no details (e. g. procedures). Crowley will need to review this program in a future inspection. We will probably have no conclusions after this week regarding the program. Since this is a major portion of licensing contention 3, I don't believe the Hearing Board will accept "promises".
3. NRR also requested that we review the pre-op testing program. I am in the process of reviewing the program which is part of an ESR.
4. CP&L is currently installing component cooling piping and pipe supports to tie in the "C" & "D" fuel pool heat exchangers. I recommend that we plan an inspection in the near future to examine the current CP&L welding QA/QC program. This should probably be performed by Crowley so he is up to date on the CP&L program in case he is required to testify at a licensing hearing.
5. I plan to inform CP&L management today that we probably not be able to reach any conclusions regarding the condition of the equipment, and will not be able to until they better define their program.

CC: Billy Crowley, George MacDonald